

EXHIBIT

19

**DECLARATION OF TODD MCLAUGHLIN
PURSUANT TO 28 U.S.C. § 1746**

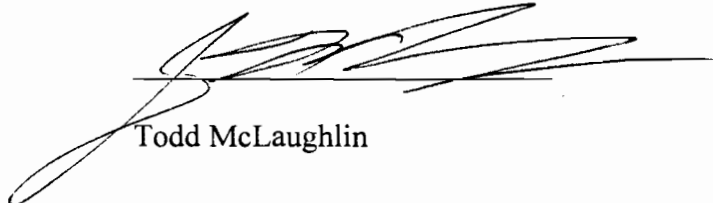
I, Todd McLaughlin, hereby state that I have personal knowledge of the facts set forth below. If called as a witness, I could and would testify as follows:

1. I am a U.S. citizen over the age of 18.
2. I am employed by the Federal Trade Commission ("FTC") as an Information Technology Specialist for the Division of Planning & Information in the Bureau of Consumer Protection in the Washington, D.C. office. I have more than 7 years of working experience in the computer field. My business address is FTC, 600 Pennsylvania Avenue, N.W., Room H-285, Washington, D.C. 20580.
3. As an Information Technology Specialist at the FTC, my duties include, but are not limited to, providing computer support to FTC attorneys and FTC investigators on Internet and computer-related matters, and maintaining the FTC Internet Lab at the FTC's Washington, D.C. headquarters.
4. From March 2007 through October 2008, I was requested to provide Investigator Sheryl Drexler with clean "virtual computers." The FTC utilizes a program called VMWare to create virtual computers, which can be accessed through any of the computers within the FTC's Internet Lab that are equipped with the VMWare software interface. Because virtual computers are housed on an FTC server, and not on the local computers in the FTC Internet Lab, they can be infected with malicious programs without infecting the local computer. Moreover, once virtual machines are infected, they can easily be reset to their previously "clean" state.
8. I created virtual computers for Investigator Drexler that utilized a version of the

Windows XP Professional Operating System that has not been updated with any security patches or other Microsoft updates. I installed this operating system from its original, out of the box, state. I then added on other programs to these virtual computers, including, among others, Lavasoft's Ad-Aware SE and HijackThis; again using the original programs. In addition to installing pristine programs, I ran tests using various security tools, including Lavasoft's Ad-Aware SE and Norton AntiVirus to confirm that there were no viruses, spyware, adware, malware or other exploitive programs within the files that composed the clean virtual computers provided to Investigator Drexler.

I state under penalty of perjury under the laws of the United States of America that the foregoing is true and accurate.

Date: 30 Oct 08



Todd McLaughlin

